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21 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

22 Virginia Sielaw,

23 Plaintiff,

24 vs.

25 Ally Financial f/k/a GMAC Automotive  
26 Bank, Barclays Bank Delaware, Equifax  
27 Information Services LLC and Trans  
28 Union LLC,

Defendants.

Case No.: 2:17-cv-02045-APG-NJK

**STIPULATION TO EXTEND  
DEFENDANT BARCLAYS BANK  
DELAWARE'S TIME TO RESPOND TO  
AMENDED COMPLAINT**

**(FIRST REQUEST)**

Compl. Filed: July 27, 2017  
Amend. Comp. Filed: August 28, 2017

Hon. Judge Andrew P. Gordon  
Hon. Magistrate Judge Nancy J. Koppe

This Stipulation to Extend Time to Respond to Amended Complaint is made by and between Plaintiff Virginia Sielaw (“Plaintiff”) and Defendant Barclays Bank Delaware (“Barclays”) through their respective counsel, in light of the following facts:

## RECITALS

A. Plaintiff filed the Complaint (“Complaint”) against Barclays on or about July 27, 2017.

B. Plaintiff filed the Amended Complaint (“Amended Complaint”) against Barclays on or about August 28, 2017.

C. Barclays' current deadline to respond to the Amended Complaint is September 11, 2017.

D. The parties agreed that Barclays' would have through September 18, 2017 to respond to the Amended Complaint in order to give Barclays time to investigate Plaintiff's claims and prepare a proper response, and for the parties to discuss a potential resolution of this matter.

E. There is good cause to grant this stipulation because Barclays requires additional time to investigate Plaintiff's claims and prepare a proper response, and the parties require additional time to consider a resolution of this matter.

F. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Barclays respectfully request that the Court extend Barclays' time to respond to Plaintiff's Amended Complaint through September 18, 2017.

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## **STIPULATION**

NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays has up to and including September 18, 2017, to file a response to Plaintiff's Amended Complaint.

## IT IS SO STIPULATED.

DATED: September 1, 2017

LEWIS ROCA  
ROTHGERBER CHRISTIE LLP

By: /s/ J Christopher Jorgenson  
J Christopher Jorgensen  
Attorneys for Defendant  
Barclays Bank Delaware

DATED: September 1, 2017

## KAZEROUNI LAW GROUP, APC

By: /s/ David H. Krieger  
Michael Kind, Esq.  
*Attorney for Plaintiff*  
*Virginia Sielaw*

## IT IS SO ORDERED

Dated: September 6, 2017

UNITED STATES MAGISTRATE JUDGE